REFERENCE 2

September 28, 2000

Consumer Attitudes Toward Potential Changes in Food Standards of Identity

Volume 1: Final Report

Prepared for

Ed Arnold
Department of Health and Human Services
Food and Drug Administration/OFACS
DCPM/Contracts Operations Branch, HFA-512
5600 Fishers Lane, FHSL Bldg., Room 2117
Rockville, Maryland 20857

Prepared by

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RTI Project Number 6673.001

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Executive Summary

The Food and Drug Administration (FDA) and the U.S. Department of Agriculture, Food Safety and Inspection Service (USDA, FSIS) contracted with the Research Triangle Institute (RTI) to assist them in their efforts to review federal standards of identity regulations. To investigate consumer attitudes toward standards of identity regulations, RTI conducted focus group discussions with household grocery shoppers.

RTI conducted a total of eight focus groups—two groups in each of four locations (Raleigh, North Carolina; San Diego, California; Philadelphia, Pennsylvania; and St. Louis, Missouri). In each location, we conducted one focus group with individuals who have a high school education and one focus group with individuals who have a college education. We conducted two groups with individuals between the ages of 18 and 30, four groups with individuals between the ages of 35 and 55, and two groups with individuals 60 years old or older.

The purpose of the focus groups was to collect information on

- consumers' attitudes toward arguments for and against standards regulations,
- consumers' preferences for standards regulations for different types of food products,
- consumers' preferences for standards regulations for the various types of requirements in standards,
- consumers' attitudes toward government review of standards regulations, and
- consumers' preferences for possible alternatives to standards regulations.

Arguments for Standards

Some standards are good for consumers because they....

1. Ensure that the product meets consumers' expectations based on the name of the product
2. Ensure that the product meets consumers' expectations for quality

---

3. Standards are good for consumers because they provide a certain degree of product uniformity

Arguments against Standards

1. All standards are bad for consumers because they are
   - unnecessary
   - costly to write and enforce

Some standards are bad for consumers because the...

2. Requirements do not accurately reflect how consumers define the product
3. Quality requirements do not accurately reflect consumers' minimum acceptable levels of quality
4. Requirements restrict innovation: new technology or newly developed ingredients

The key findings from the focus groups are summarized below.

- Many participants agreed with the three arguments in support of standards and disagreed with argument 1 against standards (see sidebar). These participants considered standards to be necessary to protect consumers.
- Some participants agreed with argument 1 against standards and considered standards unnecessary for most products. These participants said standards are not necessary because normal market forces will work to keep inferior products off the market. These participants considered current truth-in-labeling laws adequate protection for consumers.
- Participants in the 18-30 age group and those with a college education were less likely to be supportive of standards.
- Preferences for standards varied by product category. Participants considered standards to be most necessary for products with multiple ingredients and the ingredients are unrecognizable. Participants considered standards to be least necessary for products with a single, recognizable ingredient.
- Preferences for standards varied by type of requirement. Participants identified types and amounts of ingredients and quality as the requirements most important to consumers. Some participants considered manufacturing/cooking process requirements to be important, while others considered these requirements to be less important. Some participants considered requirements specifying the physical characteristics of the product to be least important to consumers and suggested that these requirements could be eliminated.
- Participants were divided as to whether percentage labeling of the key ingredient would be an acceptable alternative to minimum requirements. Some participants would like to have percentage labeling in addition to standards regulating the minimum requirement for the key ingredient.
- Participants agreed that standards should not be written just because industry requests it. Participants discussed the need to involve consumers in the development of standards.
- Participants suggested that the government review the standards on a regular basis and revise them, if necessary, to reflect advances in technology or newly developed ingredients.
- Participants discussed the need for improved labeling, including providing the percentage as well as the amount (by weight) of each ingredient on the product label.

- Participants discussed the need to educate consumers about standards and the requirements of individual standards.
- Some participants found it difficult to separate safety issues when discussing the costs and benefits of standards.

1 Introduction

On December 29, 1995 (60 FR 67492), the Food and Drug Administration (FDA) announced its intention to review its regulations pertaining to identity, quality, and fill of container for standardized foods and its common or usual name regulations for nonstandardized foods. The Agency solicited comments from all interested parties on whether these regulations should be retained, revised, or revoked. The U.S. Department of Agriculture, Food Safety and Inspection Service (USDA, FSIS) published a similar announcement on September 9, 1996 (61 FR 47453), regarding its intent to consider whether to modify or eliminate specific standards of identity for meat and poultry products, or to modify its overall regulatory approach to standardized meat and poultry products.

FDA and FSIS contracted with the Research Triangle Institute (RTI) to assist them in their efforts to review federal standards of identity regulations. To investigate consumer attitudes toward standards of identity regulations, RTI conducted focus group discussions with household grocery shoppers. RTI conducted a total of eight focus groups—two groups in each of four locations (Raleigh, North Carolina; San Diego, California; Philadelphia, Pennsylvania; and St. Louis, Missouri). In each location, we conducted one focus group with individuals who have a high school education and one focus group with individuals who have a college education. We conducted two groups with individuals between the ages of 18 and 30, four groups with individuals between the ages of 35 and 55, and two groups with individuals 60 years old or older.

The purpose of the focus groups was to collect information on

- consumers' attitudes toward arguments for and against standards regulations,
- consumers' preferences for standards regulations for different types of food products,
- consumers' preferences for standards regulations for the various types of requirements in standards,
- consumers' attitudes toward government review of standards regulations, and
- consumers' preferences for possible alternatives to standards regulations.

This report discusses the design of the focus group study and presents the key findings. The report is organized as follows: Section 2 provides a background on standards of identity regulations, Section 3 describes the study design, Section 4 presents information on participant demographics, Section 5 presents the findings from the focus group discussions, and Section 6 concludes the report.

2 Background

Practically as long as food has been distributed in commerce, food products have been regulated by the government. The 1906 Food and Drugs Act created definitions for adulteration and misbranding of foods. The 1938 Food, Drug, and Cosmetic (FD&C) Act gave the government the authority to establish and enforce standards. Likewise, the Federal Meat Inspection Act (FMIA) (21 U.S.C. 601 et seq.) and the Poultry Products Inspection Act (PPIA) (21 U.S.C. 451 et seq.) gave FSIS the authority to establish and maintain inspection programs to ensure that meat and poultry products are wholesome, unadulterated, and properly labeled and packaged. Under Section 7(c) of the FMIA and Section 8(b) of the PPIA, FSIS promulgates standards of identity for meat and poultry products. The standards drafted under the 1938 Act, FMIA, and PPIA were established to promote honesty and fair dealing in the interests of consumers, to protect the consumer from nutritional and economic fraud, to ensure a reasonable fill of container, and to establish standardized names and characteristics for products. Standards purportedly help consumers know the characteristics of food they purchase, reducing pre-purchase search costs and avoiding post-purchase product dissatisfaction. However, according to the FDA Task Group on Food Standards (1991), standards have been criticized since the 1938 Act was passed for imposing a number of costs, such as

- Z suppressing competition,
- Z erecting barriers to entry of other products,
- Z stifling innovations and new technology,
- Z retarding product variety,

- hindering manufacturers' ability to make more nutritious foods,
- posing difficulties in implementation,
- distorting demand, and
- adding to the confusion consumers have about food products.

FDA has attempted to relax and reinterpret the 1938 Act to make standards more flexible through such efforts as the issuance of Temporary Marketing Permits, the Food Additives Amendment of 1958, the Color Additive Amendments of 1960, the promulgation of the Common or Usual Names rule in 1973 (38 FR 6964), and the Nutrition Labeling and Education Act (NLEA) of 1990, which made it easier for standards to be added, amended, or revoked and mandated full ingredient labeling for all FDA standardized foods. However, standards are still widely criticized as being anti-competitive and anti-innovative, and thus harmful to the consumers' interests they are designed to protect. Although the NLEA did not directly apply to meat and poultry standards regulated by FSIS where full ingredient disclosure was already mandatory, both agencies began to take a closer look at modernizing all food standards.

The impetus to review standards of identity regulations comes from Executive Orders 12861 and 12866 and President Clinton's "Regulatory Reinvention Initiative" memorandum (the RRI memorandum) issued on March 5, 1995, to the heads of government departments and agencies, which directed them to work to make the government more effective. The President noted that the rules that govern such things as clean water, safe and wholesome food, and safe workplaces are intended to be beneficial to all Americans but often are so detailed that they threaten the objectives they are designed to achieve. The RRI memorandum instructed all departments and agencies to conduct a page-by-page review of all of their regulations and eliminate those that are outdated or in need of revision.

FDA and FSIS, recognizing that food standards may serve as an impediment to the food industry to the degree to which they fail to reflect advances in food science and technology and in accordance with President Clinton's directive, decided to review standards of identity regulations in order to revise and reform

them. On December 29, 1995 (60 FR 67492), FDA announced that it planned to review its regulations pertaining to the identity, quality, and fill of container for standardized foods to determine which standards should be retained, revised, or revoked. FDA solicited comments from all interested parties about the benefits, or lack thereof, of standards to domestic and international commerce and the value of these regulations to consumers. On September 9, 1996 (61 FR 47453), FSIS published a similar announcement regarding its intent to consider changing or eliminating existing federal standards of identity for meat and poultry products. Both Agencies believe that manufacturers of standardized foods should have the ability to incorporate new food technology into standardized products and that some standards run counter to current nutritional science. In addition, harmonizing with the less detailed international standards, to the extent feasible, is desirable to facilitate international trade. FDA and FSIS would like to eliminate unnecessary detail in the standards while at the same time ensuring that consumers are protected from nutritional and economic fraud.

To make decisions regarding revising, revoking, or retaining certain standards, FDA and FSIS need information on how consumers view possible changes in the federal standards of identity for foods. Consumer expectations may have changed drastically since standards were first implemented, particularly with the passage of the NLEA in 1990 and the availability of more product information on the label and as more scientific evidence supports the link between health and diet. Whether or not eliminating or changing existing federal standards of identity will cause substantial unfavorable economic consequences for consumers needs to be considered. FDA and the FSIS require information on how consumers view possible changes in the standards, consumers' preferences for standards, and the usefulness of standards to consumers.

3 Method

In this section we describe focus group methodology, present the study design, and discuss the development of the moderator guide.

3.1 FOCUS GROUP METHODOLOGY

Market researchers often use qualitative research methods to learn more about consumers' preferences. Focus groups are one of the most frequently used methods of qualitative research (Greenbaum, 1988). A focus group generally consists of 8 to 10 participants who discuss selected topics with a skilled moderator for approximately 1 to 2 hours. Recruiters prescreen respondents to ensure that they meet certain criteria. In exchange for contributing their time, participants receive a monetary incentive.

The moderator uses a moderator guide to serve as an outline providing structure for the focus group discussion. The moderator encourages interaction among group members and follows through on responses to ensure the discussion centers on the main issues. Greenbaum reports, "The basic philosophy behind the focus group methodology is that the dynamics of the group process will result in the generation of more useful information, on a cost-efficient basis, than would otherwise be available" (1988, p. 18).

As with any qualitative research study, the results of focus group discussions should not be generalized to a larger population in any statistical sense.

3.2 STUDY DESIGN

RTI conducted a total of eight focus groups—two groups in each of four locations (Raleigh, North Carolina; San Diego, California; Philadelphia, Pennsylvania; and St. Louis, Missouri). We selected the locations to provide geographic diversity. In each location, we conducted one focus group with individuals who have a high school education and one focus group with individuals who have a college education. We conducted two groups with individuals between the ages of 18 and 30, four groups with individuals between the ages of 35 and 55, and two groups with individuals 60 years old or older. Table 3-1 shows the population and location for the eight focus groups.

Table 3-1. Focus Group Populations and Locations

Group	Age	Education[a]	Location
1	18-30	HS	Raleigh, NC
2	35-55	C	Raleigh, NC
3	18-30	C	San Diego, CA
4	35-55	HS	San Diego, CA
5	60+	HS	Philadelphia, PA
6	35-55	C	Philadelphia, PA
7	60+	C	St. Louis, MO
8	35-55	HS	St. Louis, MO

[a]HS = High school education; C = College education.

Each focus group included eight participants for a total of 64 participants. Each group included a mix of males and females and reflected the racial diversity of the area in which the group was conducted. In addition to the population characteristics specified above, participants met the following additional criteria:

- Have primary or shared responsibility for grocery shopping in household.
- Shop for groceries at least 2 to 3 times a week.
- Do not work for a grocery store, restaurant, or food processing firm (participant or immediate family member).
- Do not work for a market research, advertising, or public relations firm (participant or immediate family member).

- Have not participated in a focus group in the past 6 months.

Appendix A provides a copy of the questionnaire used to screen and recruit participants. Participants received a monetary incentive of $50 for participating in the discussion.

3.3 MODERATOR GUIDE

The purpose of the moderator guide is to serve as an outline providing structure for the focus group discussion. Working with FDA and FSIS, RTI developed a draft moderator guide. To pretest the moderator guide, we conducted a focus group with household grocery shoppers in the Washington, DC metro area. In the pretest we found that the advantages and disadvantages of standards were not clearly defined so it was difficult to elicit participants' preferences for standards of identity regulations. Based on the pretest findings, we revised the moderator guide and conducted a second pretest. The revised moderator guide included a presentation and discussion of the arguments for and against standards to educate participants on the various trade-offs of standards regulations. Using this approach, we effectively elicited participants' preferences for standards of identity regulations. Based on the second pretest, we made a few additional changes to the moderator guide to further clarify the arguments.

The moderator guide was designed to collect information on

- participants' attitudes toward arguments for and against standards regulations,
- participants' preferences for standards regulations for different types of food products,
- participants' preferences for standards regulations for the various types of requirements in standards,
- participants' attitudes toward government review of standards regulations, and
- participants' preferences for possible alternatives to standards regulations.

Appendix B presents the final moderator guide and the handouts distributed during the group discussion. Table 3-2 provides a brief summary of each section of the moderator guide.

Table 3-2. Moderator Guide Summary

Section	Purpose
Introduction	Moderator described the purpose of the focus group and how it would be conducted; participants introduced themselves
Grocery shopping habits	Participants discussed factors considered when shopping for packaged foods and labeling information used in the purchase decision
Introduce standards of identity regulations	Moderator provided an overview of standards of identity regulations, presented examples of products with and without standards (handout), and discussed the different types of requirements in standards using food products as examples
Arguments for standards[a]	Moderator presented three arguments in support of standards regulations (handout); participants discussed whether they agreed or disagreed with each argument
Arguments against standards[a]	Moderator presented four arguments against standards regulations (handout); participants discussed whether they agreed or disagreed with each argument
Preferences for standards: product types	Moderator presented approach to categorizing packaged food products: (1) single, recognizable ingredient, (2) multiple ingredients and the ingredients are recognizable, and (3) multiple ingredients and the ingredients are no longer recognizable; participants discussed for which product types standards are more and less likely to be necessary
Preferences for standards: types of requirements	Moderator reviewed the various types of requirements in standards; participants discussed which requirements are more and less likely to be necessary
Guidelines for reviewing petitions	Participants discussed their opinions regarding government review of standards and several food products currently under review (frozen meat pizza, yogurt, and soy-based beverage products)
Alternatives to standards	Moderator presented the concept of percentage labeling; participants discussed whether this was an acceptable alternative to standards
Conclusion	Participants expressed any final comments or concerns

[a]For four of the eight groups we presented the arguments for standards first, and for four of the eight groups we presented the arguments against standards first.

We conducted the focus groups between April 25, 2000 and June 19, 2000. Each focus group lasted about 90 minutes and was audiotaped and videotaped. Volume 2 of this report provides transcripts of each focus group discussion.

4 Participant Demographics

Prior to the discussion, participants completed a questionnaire that collected demographic information. Appendix C provides a copy of the questionnaire.

A total of 64 individuals ages 18 to over 70 participated in the eight focus groups. All participants are primary grocery shoppers or share responsibility for grocery shopping in their households. Sixteen participants (25 percent) were young adults between the ages of 18 and 30, 32 participants (50 percent) were between the ages of 35 and 55, and 16 participants (25 percent) were seniors 60 years old or older. Other demographic information is summarized in Table 4-1. Table 4-2 provides demographic information by group.

Table 4-1. Participant Demographics—Summary

Gender
Female: 56%
Male: 44%
Average age
18-30 group: 27 years
35-55 group: 43 years
60 or older: 68 years
Race/Ethnicity
African-American: 22%
Asian/Pacific Islander: 3%
Caucasian: 67%
Other Race/Multiracial: 5%
No response: 3%
Hispanic or Spanish origin: 11%
Average years of education
All participants: 14 years
High school education groups: 12 years
College education groups: 17 years
Average income
All participants: $48,815
High school education groups: $37,383
College education groups: $59,531

Table 4-2. Participant Demographics, by Group

Question	Number of Participants									Percentage of Participants (%)
	Group 1 (n=8)	Group 2 (n=8)	Group 3 (n=8)	Group 4 (n=8)	Group 5 (n=8)	Group 6 (n=8)	Group 7 (n=8)	Group 8 (n=8)	Total (n=64)	
Gender										
Male	4	4	3	3	4	4	4	2	28	43.75
Female	4	4	5	5	4	4	4	6	36	56.25
Age										
18-24	2	0	1	0	0	0	0	0	3	4.69
25-30	5	0	7	0	0	0	0	0	12	18.75
31-34	1	0	0	0	0	0	0	0	1	1.56
35-39	0	4	0	3	0	1	0	4	12	18.75
40-44	0	1	0	2	0	2	0	3	8	12.50
45-49	0	2	0	1	0	2	0	0	5	7.81
50-55	0	1	0	2	0	3	0	1	7	10.94
56-59	0	0	0	0	0	0	0	0	0	0.00
60+	0	0	0	0	8	0	8	0	16	25.00
Hispanic or Spanish origin	1	2	1	2	0	1	0	0	7	10.94

Note: Group 1 = Raleigh, ages 18-30, high school education
Group 2 = Raleigh, ages 35-55, college education
Group 3 = San Diego, ages 18-30, college education
Group 4 = San Diego, ages 35-55, high school education
Group 5 = Philadelphia, ages 60+, high school education
Group 6 = Philadelphia, ages 35-55, college education
Group 7 = St. Louis, ages 60+, college education
Group 8 = St. Louis, ages 35-55, high school education

(continued)

Table 4-2. Participant Demographics, by Group (continued)

Question	Number of Participants									Percentage of Participants (%)
	Group 1 (n=8)	Group 2 (n=8)	Group 3 (n=8)	Group 4 (n=8)	Group 5 (n=8)	Group 6 (n=8)	Group 7 (n=8)	Group 8 (n=8)	Total (n=64)	
Race/ethnicity										
White/Caucasian	5	3	6	5	6	6	6	6	43	67.19
Black/African-American	2	3	1	1	2	1	2	2	14	21.88
Native American/ Alaskan Native	0	0	0	0	0	0	0	0	0	0.00
Asian/Pacific Islander	0	1	1	0	0	0	0	0	2	3.13
Another race or multiracial	1	1	0	1	0	0	0	0	3	4.69
No answer	0	0	0	1	0	1	0	0	2	3.13
Education										
11th grade or less	0	0	0	1	0	0	0	0	1	1.56
High school graduate or GED	8	0	0	5	8	0	0	8	29	45.31
Some college	0	0	0	2	0	0	1	0	3	4.69
College graduate	0	7	3	0	0	5	2	0	17	26.56
Postgraduate	0	1	5	0	0	3	5	0	14	21.88

Note: Group 1 = Raleigh, ages 18-30, high school education
Group 2 = Raleigh, ages 35-55, college education
Group 3 = San Diego, ages 18-30, college education
Group 4 = San Diego, ages 35-55, high school education
Group 5 = Philadelphia, ages 60+, high school education
Group 6 = Philadelphia, ages 35-55, college education
Group 7 = St. Louis, ages 60+, college education
Group 8 = St. Louis, ages 35-55, high school education

(continued)

Table 4-2. Participant Demographics, by Group (continued)

Question	Number of Participants									Percentage of Participants (%)
	Group 1 (n=8)	Group 2 (n=8)	Group 3 (n=8)	Group 4 (n=8)	Group 5 (n=8)	Group 6 (n=8)	Group 7 (n=8)	Group 8 (n=8)	Total (n=64)	
Total household income before taxes										
$9,999 or less	1	0	0	0	0	0	0	0	1	1.56
$10,000 – $14,999	0	0	0	0	0	0	0	0	0	0.00
$15,000 – $19,999	0	0	1	2	2	0	0	2	7	10.94
$20,000 – $24,999	1	0	0	0	3	0	0	1	5	7.81
$25,000 – $34,999	1	0	2	0	2	0	2	1	8	12.50
$35,000 – $49,999	1	2	1	3	0	1	2	1	11	17.19
$50,000 – $74,999	4	3	3	2	0	4	1	3	20	31.25
More than $75,000	0	3	1	0	0	3	3	0	10	15.63
No answer	0	0	0	1	1	0	0	0	2	3.13

Note: Group 1 = Raleigh, ages 18-30, high school education
Group 2 = Raleigh, ages 35-55, college education
Group 3 = San Diego, ages 18-30, college education
Group 4 = San Diego, ages 35-55, high school education
Group 5 = Philadelphia, ages 60+, high school education
Group 6 = Philadelphia, ages 35-55, college education
Group 7 = St. Louis, ages 60+, college education
Group 8 = St. Louis, ages 35-55, high school education

5 Results

In this section we present the key findings from the focus group discussions. We discuss participants' attitudes toward arguments for and against standards regulations, participants' preferences for standards regulations for different types of food products, participants' preferences for standards regulations for the various types of requirements in standards, participants' attitudes toward government review of standards regulations, and participants preferences for possible alternatives to standards regulations. We discuss the overall findings for all participants and discuss any significant variations between groups and by participant demographics; for example, age, education, and gender. These results represent the opinions of the 64 participants and cannot be projected to the population of U.S. consumers. Appendix D provides individual summaries for each of the eight focus groups.

5.1 ARGUMENTS FOR AND AGAINST STANDARDS

After a 10-minute overview of standards and the types of requirements in standards, the moderator introduced participants to the controversy associated with standards of identity regulations. The moderator explained that some people think standards are bad for consumers and should be revised or eliminated and some people think that standards are good for consumers and should not be changed. The moderator explained that she was going to present several arguments for and against standards and that each of the arguments does not necessarily apply to all standards; that some might apply to certain standards and some might apply to other standards. The moderator

reminded participants to consider each argument on its own merits; for example, if a participant agreed with one of the arguments for standards she should not feel that she must therefore agree with all of the other arguments for standards and disagree with all of the arguments against standards.

The moderator guide (see Appendix B) provides the description of each argument presented to participants. The arguments are summarized in Exhibit 5-1. For four of the eight groups we presented the arguments for standards first, and for four of the eight groups we presented the arguments against standards first.

Exhibit 5-1. Arguments for and against Standards

Arguments for Standards

Some standards are good for consumers because they....

1. Ensure that the product meets consumers' expectations based on the name of the product
2. Ensure that the product meets consumers' expectations for quality

---

3. Standards are good for consumers because they provide a certain degree of product uniformity

Arguments against Standards

1. All standards are bad for consumers because they are
   - unnecessary
   - costly to write and enforce

Some standards are bad for consumers because the...

2. Requirements do not accurately reflect how consumers define the product
3. Quality requirements do not accurately reflect consumers' minimum acceptable levels of quality
4. Requirements restrict innovation: new technology or newly developed ingredients

In discussing the arguments, some participants found it difficult to separate safety issues from standards. Also, some participants found the arguments confusing since consumers are not generally aware of standards and the requirements for standardized products.

Many participants agreed with the three arguments in support of standards and disagreed with argument 1 against standards. These participants considered standards to be necessary to protect consumers. Some participants agreed with argument 1 against standards and considered standards to be unnecessary for most products. Many participants did not offer an opinion for the other three arguments used to criticize standards. Participants' comments about each argument are summarized below. A separate working paper (Cates and Carter-Young, 2000) provides supporting documentation on participants' opinions on the arguments for and against standards.

5.1.1 Participants' Opinions on the Arguments for Standards

1. *Some standards are good for consumers because they ensure that the product meets consumers' expectations based on the name of the product.*

Many participants agreed with this argument in support of standards. In four of the eight groups, all participants agreed with this argument. In the other four groups, participants were divided—some agreed, some disagreed, and some were undecided or did not offer an opinion.

Participants in the 18-30 age group and those with a college education were less likely to agree with this argument compared to other participants. Our findings suggest that opinions on this argument did not vary by focus group location or gender.

The participants who supported this argument agreed that consumers have certain expectations for products and want the products they purchase to meet these expectations. As one participant said, "when I buy peanut butter I want peanut butter; I'm not buying spread."

Participants discussed that standards make shopping easier by allowing consumers to base purchase decisions on the name of the product. Participants said that without standards consumers would have to purchase products by trial and error, so they might sometimes be dissatisfied with their purchases. One participant said that without standards product names like "fruit cocktail" might become meaningless.

In discussing this argument some participants expressed concern that without standards companies might produce inferior products. Participants discussed the need for government oversight to protect consumers. Participants said that standards are necessary to ensure consumers that products are named and labeled appropriately.

In the San Diego, ages 18-30 group, participants discussed that the standards as currently written do not ensure that products meet consumers' expectations. Participants discussed the need for better labeling, including percentage labeling of all ingredients.

Several participants disagreed with the argument. Participants who disagreed with this argument said that standard names are irrelevant to consumers since they are not aware of the requirements for standardized products. Others discussed that they do not have expectations for packaged food products. Some participants who disagreed with the argument considered standards unnecessary and do not think the government should spend tax dollars writing and enforcing standards.

A few participants had mixed opinions on this argument. They said that whether or not standards are necessary depends on the consumer and the purpose of the food. For example, the physical characteristics of the product may not be as important when preparing food for a large gathering.

2. *Some standards are good for consumers because they ensure that the product meets consumers' expectations for quality.*

Many participants agreed with this argument in support of standards. In four of the eight groups, all participants agreed with this argument.

Participants in the 35-55 age group were more likely to agree with this argument compared to participants in the other age groups. Our findings suggest that opinions on this argument did not vary by education level, focus group location, or gender.

Participants who agreed with this argument discussed the importance of quality. Participants agreed that consumers have similar expectations for quality and that some minimum level of quality should be enforced. Participants said that quality requirements are good for certain products and help consumers to

distinguish products that do not meet the standards. Participants were concerned that without standards the level of quality would decline. As discussed later in this section, participants considered quality requirements to be one of the most important types of requirements in standards.

Several participants disagreed with the argument. Some of the participants who disagreed with this argument said that consumers might have different expectations for quality since quality is subjective. They said that some consumers might accept a lower quality product at a lower price. One participant said it is not the government's responsibility to regulate product quality. These participants would prefer to have more variety in product quality to a set standard.

Some participants who disagreed with the argument said that quality requirements are important for products like meat, milk, and cheese, but they are meaningless for products like canned corn since consumers do not know the minimum acceptable levels of quality for standardized products. One participant suggested that instead of labeling substandard corn as "below standard: contains excessive cob"—which is meaningless if consumers do not know the standard—to use percentage labeling (for example, contains 2 percent cob).

Participants discussed that there are differences in quality among standardized products. Most participants considered name brands to be of higher quality. Some participants incorrectly assumed that generic or store brands do not meet the relevant standards.

3. *Standards are good for consumers because they provide a certain degree of product uniformity.*

Many participants agreed with this argument in support of standards. In three of the eight groups, all participants agreed with this argument. Our findings suggest that opinions on this argument did not vary by participant demographics.

Participants who agreed with this argument said that standards provide product uniformity, which is desirable to consumers. Participants discussed the importance of product uniformity and

consistency when shopping. One participant pointed out that standards allow one to shop based on price.

Participants discussed that they have expectations for certain products and that standards ensure these expectations are met. Participants said that with standardized products one knows what they are getting.

Several participants said that although they agree with this argument, they do not consider it a good reason to have standards. These participants think that standards are unnecessary.

In several groups participants discussed the importance of brand names. One participant said that brand names are what matter, *not* standards that are set by the government. Others agreed, saying that they always buy the same brand names.

When asked whether eliminating standards would make it harder or easier to find acceptable products, participants had mixed opinions. Those who generally thought standards were unnecessary said that eliminating standards would have no impact on shopping. One participant said if standards were eliminated the market would respond to consumers' preferences and would create product uniformity.

Those who generally thought standards were necessary said that eliminating standards would make shopping more difficult. They were concerned that consumers would be faced with a multitude of products and would have to spend more time comparing labels to find products that were acceptable to them. As one participant said, "with standards you avoid spending hours in the grocery store."

5.1.2 Participants' Opinions on the Arguments against Standards

1. *All standards are bad for consumers because they are (1) unnecessary and (2) costly to write and enforce.*

Many participants disagreed with this argument used to criticize standards. In two of the eight groups, all participants disagreed with this argument.

Participants in the 18-30 age group and participants who are college educated were more likely to agree with this argument compared to other participants. Most participants in the St. Louis and Philadelphia groups disagreed with the argument, while participants in the Raleigh and San Diego groups were divided—some agreed, some disagreed, and some had mixed opinions. Opinions on this argument did not vary by gender.

Those who disagreed with the argument said that standards are necessary, despite the laws of supply and demand and truth-in-labeling laws. These participants said it is necessary for the government to impose standards regulations on industry to protect consumers from economic fraud. These participants like knowing that the government is "watching over" companies. Several participants commented that this is one area in which the government is doing a good job. Some participants discussed that they would like to have standards for more products, including cereal and bottled water.

Participants discussed that with standards they know the products they purchase are going to meet their expectations. These participants said they do not want to have to try different products to find the one they like. Participants agreed that standards make shopping easier.

Some participants who disagreed with this argument expressed concern that if standards were eliminated product quality would decline and consumers would have to spend more time in grocery stores choosing products they want. Two participants said that "chaos" would result without standards.

Some participants who disagreed with this argument said that standards regulations benefit consumers and considered the benefits to outweigh the costs. One participant said that she would prefer the government save tax dollars in other ways rather than eliminating standards.

Some participants agreed with the argument used to criticize standards. These participants said that standards are *not* necessary because normal market forces will work to keep products that do not meet consumers' expectations off the market. Participants considered current truth-in-labeling laws adequate protection for consumers. These participants said it is okay if

consumers sometimes have to try different products to find the one that meets their expectations, even if this means they will sometimes be dissatisfied with their purchases.

Some participants who agreed with this argument were concerned about government involvement in private business and the cost of standards regulations. As one participant said, "it is not the government's responsibility to regulate the physical characteristics of food products." One participant considered standards regulations to be costly and would prefer the government use this money for other purposes. Some participants said that standards benefit industry, not consumers since standards are often written in response to industry petitions. A few participants said that standards are not necessary since standards do not exist for all products.

A few participants had mixed opinions, agreeing with parts but not all of the argument. One participant said that standards are necessary to a point, but agrees that standards are costly to write and enforce. She thinks industry should bear the cost of standards regulations. Several participants said that standards could be eliminated for some, but not all, products; for example, ingredient requirements are necessary, but requirements specifying physical characteristics are not necessary.

One participant questioned the purpose of standards. He said that standards are arbitrary since consumers do not know the requirements for standardized products. Other participants agreed that consumers need to be educated about standards and the specific requirements of individual standards. Several participants said that standards do not benefit consumers if they are not aware of them.

2. *Some standards are bad for consumers because the requirements do not accurately reflect how consumers define the product.*

This argument was briefly discussed in all but one group (St. Louis, ages 35-55). Discussion on this topic was often limited due to time constraints. Many participants did not offer an opinion on this argument. In many cases, participants commented on the argument but did not clearly state whether they agreed or disagreed, so it was difficult to determine their opinion. Some

participants found this argument confusing since consumers do not know the requirements for standardized products.

Participants with an opinion on this argument were about equally divided. The participants who agreed with this argument said that consumers may have different preferences so some standards could be bad for consumers. One participant said that without standards there would be more product variety and consumers would have more choices.

The participants who disagreed with this argument said that standards are good for consumers although the requirements might not always reflect the preferences of individual consumers. One participant said that this is not a valid argument because standards do not prevent companies from producing products; he cited peanut butter spread as an example. Several participants said that this is not a good argument since they are not reluctant to try foods that are labeled with nonstandard names, particularly if the product is lower priced. One participant cited the example of jelly spread saying that she prefers this product to traditional jelly.

3. *Some standards are bad for consumers because the quality requirements do not accurately reflect consumers' minimum acceptable levels of quality.*

This argument was briefly discussed in all but one group (St. Louis, ages 35-55). Discussion on this topic was often limited due to time constraints. Many participants did not offer an opinion on this argument. In many cases, participants discussed the importance of quality requirements but did not clearly state whether they agreed or disagreed with the argument, so it was difficult to determine their opinion. Some participants found this argument confusing since consumers do not know the requirements for standardized products. One participant questioned why this was even offered as an argument.

Participants with an opinion on this argument were about equally divided. The participants who agreed with this argument said that consumers may have different quality preferences so some standards could be bad for consumers. Participants discussed that some consumers may be willing to accept lower quality products, especially if they cost less.

The participants who disagreed with this argument were generally supportive of standards. Some participants considered the current quality requirements to be set too low and were concerned that eliminating standards would result in even lower quality products. Some participants said they like having a set standard so that all brands meet the same basic requirements.

4. *Some standards are bad for consumers because the requirements restrict innovation: new technology or newly developed ingredients.*

Many participants did not offer an opinion on this argument. In many cases, participants discussed the Parmesan cheese example used in the presentation of the argument, but did not clearly state whether they agreed or disagreed with the argument, so it was difficult to determine their opinion. Of those with an opinion, most agreed with the argument.

The participants who agreed with this argument said that standards could restrict innovation. They agreed that consumers would be less likely to purchase a product that was not labeled using the traditional name. Some participants said it was acceptable for standards to be revised to reflect technological change as long as the organoleptic (look, taste, smell) characteristics of the product remained the same. One participant said that if there were no standards, there would be more innovation among companies. One participant said the possible restriction of innovation is a drawback to having standards, but necessary to realize the benefits of standards.

The participants who disagreed with this argument said that standards do not restrict innovation. One participant considered the regulations loose enough to accommodate the introduction of new technologies and ingredients. Several participants said that standards do not restrict innovation because companies can use new technologies to make products and label them using a nontraditional name. One participant said that if companies want to use a new technology then they should bear the cost of having the standard changed.

Many participants did not provide an opinion on the argument. Instead they discussed whether it was acceptable for a product to be labeled as "Parmesan cheese" if it looked and tasted like

traditional Parmesan cheese but did not meet the aging requirements of the standard. Participants were about equally divided on this issue. Some participants said it was acceptable to label the product as "Parmesan cheese" as long as it looked and tasted like the traditional product. Others disagreed saying the product should *not* be labeled as Parmesan cheese if it is not made using the traditional aging method. In one group, Alpine Lace cheese—a Swiss-cheese like product that does not meet the standard—was discussed.

Some participants voiced concerns about new technologies and ingredients, although those concerns appeared to be safety-related. These participants said consumers have the right to know if a new technology is being used to make a product.

Several participants suggested that the government develop a system to periodically update the standards to reflect advances in technology. Others agreed with this recommendation.

5.1.3 Starting Point Bias

To evaluate whether there was starting point bias—that is, the ordering of the arguments influenced or biased participants' opinions—we varied the order of presenting the arguments for and against standards. For four of the eight groups we presented the arguments for standards first, and for four of the eight groups we presented the arguments against standards first. Within the arguments for/against standards, we did not vary the order of the presentation of each individual argument. For example, in discussing the arguments against standards we always started with the argument that all standards are bad for consumers because they are unnecessary and costly to write and enforce.

To evaluate the presence of starting point bias, we examined participants' responses by the order in which the arguments were presented (Cates and Carter-Young, 2000). Based on this evaluation, we can conclude that the ordering of the arguments may have influenced participants' opinions for "pro" argument 1 and "con" argument 1. Participants who discussed the "con" arguments first were more likely to agree with "con" argument 1 and to disagree with "pro" argument 1. Also, we can conclude that the ordering of the arguments did *not* influence participants'

opinions for "pro" arguments 2 and 3. Many participants did not offer an opinion for "con" arguments 2, 3, and 4 so we cannot evaluate starting point bias for these arguments.

5.2 PREFERENCES FOR STANDARDS: PRODUCT TYPES

To elicit consumers' preferences for standards of identity regulations for different types of packaged foods, we defined three product categories:

- Single, recognizable ingredient
- Multiple ingredients and the ingredients are recognizable
- Multiple ingredients and the ingredients are no longer recognizable

Exhibit 5-2 describes the product categories and provides examples of standardized products in each category.

Exhibit 5-2. Product Categories

1.	***Single, recognizable ingredient*** This category includes products with one ingredient that is recognizable to the consumer. Examples include canned corn, canned pears, and other canned fruits and vegetables; orange juice and some other canned juices; and milk and cream.
2.	***Multiple ingredients and the ingredients are recognizable*** This category includes products with more than one ingredient and the ingredients are recognizable to the consumer. Examples include frozen pepperoni pizza, beef stew, fruit cocktail, and mixed nuts.
3.	***Multiple ingredients and the ingredients are no longer recognizable*** This category includes products with more than one ingredient but the ingredients are combined in such a way that they are no longer recognizable to the consumer. Examples include cheeses, hot dogs, mayonnaise, and margarine.

The moderator asked participants for which categories they considered standards to be more likely to be necessary and less likely to be necessary.

Most participants considered standards to be most necessary for products with multiple ingredients and the ingredients are no longer recognizable. Many participants considered standards to

also be necessary for products with multiple, recognizable ingredients, while some participants said that standards are not as necessary for this category. Many participants considered standards to be least important for products with a single, recognizable ingredient. Some participants said standards are necessary for *all* products, while several participants said that standards are not necessary for *any* products. Participants' comments about each product category are summarized below.

5.2.1 Multiple Ingredients and the Ingredients Are No Longer Recognizable (Category 3)

Most participants considered standards to be most necessary for products with multiple ingredients and the ingredients are no longer recognizable (category 3). Several participants said that standards are not necessary for *any* products, including category 3.

Many participants considered standards to be necessary for *all* products, but if forced to choose one category as most important they said they would select category 3. A few participants ranked the product categories as follows, from most to least important: (1) multiple, unrecognizable ingredients; (2) multiple, recognizable ingredients; and (3) single, recognizable ingredient.

Participants said standards are necessary for products in category 3 because consumers could not base their buying decision by simply looking at the product. They were concerned that without standards companies might include unnecessary ingredients in a product or use poor quality ingredients. When discussing product category 3, some participants discussed the need for standards to protect consumers.

The participants who said standards are *not* necessary for category 3 were generally opposed to standards throughout the discussion. One participant said that standards are not necessary, that consumers could base buying decisions on brand names.

A few participants said that standards are not as important for category 3 since consumers can read the ingredients list to determine what ingredients are present and in what order. One

participant disagreed saying the names of some ingredients (for example, chemical additives) are meaningless.

5.2.2 Multiple Ingredients and the Ingredients Are Recognizable (Category 2)

Many participants considered standards to also be necessary for products with multiple ingredients and the ingredients are recognizable (category 2), while some participants said that standards are not as necessary or unnecessary for this category.

Participants who considered standards to be necessary for this category were generally pro standards throughout the discussion. One participant said that he has expectations based on the product name. He was concerned that without standards, he might purchase a product labeled as "beef stew" but get a product that's more like pea stew.

The participants who said standards are not as necessary or unnecessary for products in category 2 were generally opposed to standards throughout the discussion. Some participants discussed the standard for mixed nuts, saying that the standard does not meet their expectations (too many peanuts, not enough cashews). Others discussed the standard for fruit cocktail and questioned the usefulness of the standard; several participants suggested that such standards could be eliminated. Some participants said that while the standards for products in category 2 are not as necessary, they would not like to see these standards eliminated.

One participant said the need for standards for product category 2 depends on the particular product. He suggested that a product that consumers could see through the packaging (for example, frozen pepperoni pizza) might not need standards, but canned products might need standards.

5.2.3 Single, Recognizable Ingredient (Category 1)

Many participants considered standards to be least important for products with a single, recognizable ingredient (category 1). Some participants disagreed and said standards are necessary for *all* products, including category 1.

Participants who considered standards to be necessary for this category were generally pro standards throughout the discussion and did not want standards to be eliminated for *any* food products. One participant stated, "You need them for all three. Whether there's one or twenty ingredients, I want to know that somebody's watching." Others agreed saying that standards are necessary to keep companies honest.

These participants feared that product quality would decline if standards were eliminated. Several participants discussed orange juice, a standardized product, and were concerned that without a standard they might purchase a product labeled as "orange juice" and it might contain mostly water.

The participants who said standards are not as necessary or unnecessary for products in category 1 were not as concerned about this product category. Participants discussed that products in this category are easy to monitor and consumers can see what is in the product, so standards are not as necessary. Some participants said that while the standards for products in category 1 are not as necessary, they would *not* like to see these standards eliminated.

Several participants said the need for standards in category 1 varies depending on the product. For example, one participant said she considered standards to be necessary for orange juice, but not for canned corn.

5.3 PREFERENCES FOR STANDARDS: TYPES OF REQUIREMENTS

To elicit consumers' preferences for the different types of requirements included in standards, we defined five types of requirements:

1. Types and amounts of ingredients
2. Amount of characterizing ingredient
3. Quality
4. Physical characteristics
5. Manufacturing/cooking process

Exhibit 5-3 defines each type of requirement and provides examples of standardized products with each type of requirement.

To evaluate the relative importance of the requirements, the moderator asked participants the following questions:[1]

- Which one or two requirements are most important for consumers?
- Are any of the requirements unnecessary?

Exhibit 5-3. Types of Requirements

1. *Types and Amounts of Ingredients*   This requirement specifies the ingredients the product must contain and in some cases the amount of those ingredients. There are also requirements that specify the ingredients the product may contain (optional ingredients) and the amounts of those ingredients. Examples of standardized products with this requirement include fruit cocktail and mixed nuts. For example, the standard for fruit cocktail says that products labeled as "fruit cocktail" must contain peaches, pears, pineapple, grapes, and cherries. The standard also specifies the amount of each type of fruit the product must contain, for example, 2 to 6 percent cherries.
2. *Amount of Characterizing Ingredient*   This requirement specifies the minimum amount of the characterizing ingredient, that is, the valuable or key ingredient in the product. Examples of standardized products with this requirement include peanut butter and products containing meat (for example, beef stew, corned beef hash, chili, and frozen pepperoni pizza). For example, the standard for peanut butter says that products labeled as "peanut butter" must contain at least 90 percent peanuts.
3. *Quality*   This requirement specifies product characteristics that some consumers may associate with product quality. Examples of standardized products with quality requirements include canned corn and other canned fruits and vegetables. For example, there is a standard regulating the amount of cob, husk, and silk in canned corn. If canned corn contains more than 1 cubic centimeter of cob it must be labeled as below standard in quality.
4. *Physical Characteristics*   This requirement specifies the physical characteristics of the product. For example, the standard for petit pois, or baby peas, says that for products to be labeled as "petit pois" the peas must pass through a circular opening 0.28 inches in diameter.
5. *Manufacturing/Cooking Process*   This requirement specifies how the product must be made. Examples of standardized products with manufacturing/cooking process requirements include Parmesan cheese and hot dogs. For example, the standard for Parmesan cheese says that products labeled as "Parmesan cheese" must be aged at least 10 months.

Participants identified types and amounts of ingredients and quality as the requirements most important to consumers. Some participants considered manufacturing/cooking process requirements to be important, while others considered these

[1]These questions were not asked in the two Raleigh focus groups.

requirements to be less important. Some participants considered requirements specifying the physical characteristics of the product to be least important to consumers. Some suggested these requirements could be eliminated.

Several participants discussed that the importance of the requirement varies depending on the product. For example, physical characteristic requirements are important for products like shrimp (specifying the size—small, medium, or large), but less important for products like canned peas. Several participants who were opposed to standards throughout the discussion said that none of the requirements are necessary. Participants' comments about each type of requirement are summarized below.

5.3.1 Types and Amounts of Ingredients

Many participants considered requirements specifying the types and amounts of ingredients to be most important to consumers. Participants discussed that they want to know what the product contains. Some participants pointed out that consumers could get this information from the ingredients list on the product label.

In three of the focus groups, several participants questioned the value of standards for products like fruit cocktail and mixed nuts. One participant said requirements specifying the types and amounts of ingredients for these products do not benefit consumers because they do not address the quality of ingredients. He also pointed out that consumers might have different preferences for the types of fruit in fruit cocktail. This led to a group discussion as to whether the standard for fruit cocktail was necessary. Some participants, including those who had previously considered this requirement to be important, agreed that the standard for fruit cocktail is not necessary.

In the two Raleigh groups, participants discussed the standard for mixed nuts. Most participants agreed that the standard for mixed nuts does not meet their expectations (too many peanuts, not enough cashews). One participant questioned whether standards really benefit the consumer if standardized products do not meet their expectations.

5.3.2 Amount of Characterizing Ingredient

In discussing requirements specifying the amount of the characterizing ingredient, some participants had difficulty distinguishing this requirement from requirements specifying the types and amounts of ingredients.

Some participants considered requirements specifying the amount of the characterizing ingredient to be important to consumers. One participant said this requirement is necessary so consumers do not purchase a product containing less of the key ingredient than expected. A few participants wondered if this requirement was necessary since the product label lists the ingredients in order of predominance.

5.3.3 Quality

Many participants considered quality requirements to be most important to consumers. Participants discussed the importance of product quality. One participant stated that quality encompasses everything.

A few participants said quality requirements were not as important to consumers. One participant said that if she purchased a product of poor quality she would not buy it again.

5.3.4 Physical Characteristics

Some participants considered requirements specifying the physical characteristics of the product to be least important to consumers. Some suggested these requirements could be eliminated and left to market forces.

A few participants considered physical characteristic requirements to be important. One participant said he likes for the product to look good. Another said that in some instances, like baking, a product's physical characteristics are important.

5.3.5 Manufacturing/Cooking Process

Some participants considered manufacturing/cooking process requirements to be important, while others considered these requirements to be less important.

Some participants considered this requirement to be safety-related so they considered this to be an important requirement. One participant said that consumers can evaluate the other requirements by looking at the product or reading the ingredients list, but this was not possible for manufacturing/cooking process requirements.

5.4 ATTITUDES TOWARD GOVERNMENT REVIEW OF STANDARDS

The moderator asked participants for their opinions on several current petitions and for guidance on factors to consider when reviewing petitions.

5.4.1 Opinions on Petitions

We asked participants for their opinions on current petitions for frozen meat pizza, yogurt, and soy-based beverage products (soy milk). Because of time constraints, all groups did not discuss the different petitions.

Frozen Meat Pizza

The two Raleigh groups discussed the National Frozen Pizza Institute and the Consumer Federation of America's Food Policy request for USDA to eliminate the standard for frozen meat and sausage pizzas. Currently there is a standard for frozen meat pizza specifying the minimum amount of meat. These groups say that eliminating the standard would encourage manufacturers to offer versions of pizza that have less meat and thus are lower in fat (*Food Labeling & Nutrition News*, 1999).

The two Raleigh groups were divided on the need for standards for frozen meat pizza. In one group (ages 35-55, college educated) most participants agreed that a standard was necessary to protect consumers from purchasing a product with insufficient meat. These participants like knowing that the pizza they buy contains a minimum amount of meat.

In the other group (ages 18-30, high school), most participants agreed that a standard was unnecessary. Participants discussed that companies that make a product with too little meat would not be successful, because consumers would not buy the product.

Participants also discussed that the price of the product would reflect the amount of meat, so consumers could base buying decisions on price. Others discussed that standards for pizza are not necessary if clear packaging is used because consumers can see the amount of meat on the product.

Yogurt

The two Raleigh groups and one St. Louis group (ages 35-55, high school) discussed the National Yogurt Association's (NYA) current petition for yogurt. The NYA has asked FDA to amend the standard of identity for yogurt to clarify what it calls "incomplete and unclear" standards currently in place (*Food Labeling & Nutrition News*, 2000). The moderator explained to participants that the NYA wants the government to revise the current standard for yogurt to add a requirement that products labeled as yogurt contain a minimum amount of live and active cultures. Participants were told that according to this organization, live and active cultures offer some health benefits and that products that are heat-treated to kill the live cultures can now be called yogurt.

In each group, only a few participants discussed the petition to revise the yogurt standard. Those with an opinion agreed with the NYA and said that products labeled as "yogurt" should contain live and active cultures. One participant commented that she eats yogurt specifically for the health benefits of live and active cultures.

Soy Milk

In all groups, the moderator asked participants to comment on the use of the phrase "soy milk" for labeling soy-based beverage products. The National Milk Producers Federation (NMPF) wants FDA to take enforcement action against companies labeling soy-based beverage products as "soy milk" (*Food Chemical News*, 2000). The moderator explained that the NMPF says that the government should not allow soy-based beverage products to be labeled as "soy milk" since the product does not meet the standard for milk. Participants were told that the American Soybean Association disagrees. The moderator asked participants what they thought about this argument and what kind

of product they considered soy-based beverage products to be. In most groups, only several participants offered an opinion.

For those with an opinion, most participants thought that it was acceptable to label soy-based beverage products as "soy milk." Participants agreed that soy milk is not a dairy product but considered it acceptable to use this name since other nondairy products are labeled as milk, for example, rice milk and coconut milk. Some participants described soy-based beverage products as a substitute for milk or nondairy milk. Participants did not consider the label misleading since the word "soy" lets consumers know what they are buying. One participant pointed out that the product was not being falsely labeled as "cow's milk." Participants were not concerned that products labeled as "soy milk" do not meet the standard for milk.

A few participants disagreed and said that companies should not be allowed to label soy-based beverage products as soy milk. One participant said he sides with the dairy industry; he thinks that soy milk is not a milk product or a dairy product. One participant considered milk to come only from cows, so he did not think a product made from soybeans should be labeled as "soy milk." One participant was concerned that consumers might be confused if soy-based beverage products are labeled as "soy milk." He said that substitute products should not be labeled using the traditional name; for example, saccharine is labeled as saccharine sweetener, not saccharine sugar.

5.4.2 Guidelines for Reviewing Petitions

The moderator asked participants what factors the government should consider when industry requests that a new standard be written or an existing standard be revised or eliminated. Participants also discussed when they consider new standards to be justified or necessary.

Participants discussed the need to obtain input from consumers, not just industry. Some participants think consumers are not sufficiently involved in the development of standards. Participants suggested seeking input from consumers through focus groups and surveys. One participant suggested that consumer advocacy groups should play a role in the process. One participant said that

it was not necessary to poll the general public about standards; instead, individuals such as dieticians and nutritionists should be involved in the development of standards.

Some participants said that standards should not be written just because industry requests it. They said that standards are supposed to benefit consumers, not industry. Some participants were suspicious of companies requesting the government to write standards for their products. They said it all comes down to politics and who has the better lobbying group. One participant said that politics needs to be eliminated from the process, but said that would be impossible. One participant suggested involving federal and state congresses to ensure that standards are written for consumers' benefit.

Several participants suggested that the government review the standards on a regular basis and revise them, if necessary, to reflect advances in technology or newly-developed ingredients. Others agreed with this recommendation.

Participants discussed how the government should decide which products need standards. One participant suggested using the three product categories; in her opinion only products with multiple, unrecognizable ingredients need standards. Several participants suggested monitoring consumer complaints to identify products that might require standards.

In several groups this topic led to a discussion of the need for improved labeling, including providing the percentage as well as the amount (by weight) of each ingredient on the product label. A few participants suggested that standards could possibly be eliminated if improvements were made in labeling.

In several groups this topic often led to a discussion that consumers are not aware of standards and the requirements for standardized products. Some participants discussed the need to educate consumers about standards and the particular requirements of individual standards. One participant suggested labeling standardized products with a seal so consumers could easily distinguish between products meeting and not meeting the relevant standards.

5.5 ALTERNATIVES TO STANDARDS

The moderator introduced the concept of percentage labeling and asked participants if they considered this to be an acceptable alternative to standard requirements regulating the minimum amount of the characterizing ingredient. With percentage labeling, the requirement specifying the minimum amount of the key ingredient would be eliminated and companies would be required to provide the amount of the key ingredient in the product name on the label. For example, instead of having a requirement specifying that products labeled as "peanut butter" must contain at least 90 percent peanuts, companies could label products containing less than that amount as "peanut butter" but provide the percentage of peanuts as part of the product name on the label; for example, "peanut butter—60% peanuts."

Participants understood the concept of percentage labeling and compared it to labeling on other products; for example, ground beef, bran cereal, and margarine. Participants discussed the need for the ingredient percentage to be large enough to see on the label. Participants were about equally divided as to whether percentage labeling would be an acceptable alternative to minimum requirements.

Participants who said percentage labeling would be a good alternative to minimum requirements offered the following comments. Several participants were very vocal throughout the discussion about the need to provide more information on product labels, so the concept of percentage labeling was very appealing to them. Some participants said they preferred this alternative to minimum requirements. Several participants said percentage labeling would give the consumer more choices.

Participants who said percentage labeling was *not* an acceptable alternative to minimum requirements offered the following comments. Some participants did not like this alternative saying it would make shopping more difficult since consumers would have to spend more time reading and comparing labels. Some participants liked the concept of percentage labeling but would like to have percentage labeling *in addition* to the minimum requirement. These participants were concerned that product quality would decline if the standard were eliminated.

In several groups participants discussed other possible alternatives to standards. One participant suggested the use of clear packaging so consumers can see a product before buying it. She thought this would be especially effective for multiple, recognizable ingredient products.

6 Conclusion

The focus groups provided information on participants' attitudes toward arguments for and against standards, participants' preferences for standards regulations for different types of food products and the various types of requirements in standards, and participants' attitudes toward government review of standards regulations. Our key findings our summarized below.

- Many participants agreed with the three arguments in support of standards and disagreed with argument 1 against standards (all standards are unnecessary and they are costly to write and enforce). These participants considered standards to be necessary to protect consumers.
- Some participants agreed with argument 1 against standards and considered standards unnecessary for most products. These participants said standards are not necessary because normal market forces will work to keep inferior products off the market. These participants considered current truth-in-labeling laws adequate protection for consumers.
- Participants in the 18-30 age group and those with a college education were less likely to be supportive of standards.
- Preferences for standards varied by product category. Participants considered standards to be most necessary for products with multiple ingredients and the ingredients are unrecognizable. Participants considered standards to be less necessary for products with a single, recognizable ingredient.
- Preferences for standards varied by type of requirement. Participants identified types and amounts of ingredients and quality as the requirements most important to consumers. Some participants considered

manufacturing/cooking process requirements to be important, while others considered these requirements to be less important. Some participants considered requirements specifying the physical characteristics of the product to be least important to consumers and suggested that these requirements could be eliminated.

- Participants were divided as to whether percentage labeling of the key ingredient would be an acceptable alternative to minimum requirements. Some participants would like to have percentage labeling in addition to standards regulating the minimum requirement for the key ingredient.
- Participants agreed that standards should not be written just because industry requests it. Participants discussed the need to involve consumers in the development of standards.
- Participants suggested that the government review the standards on a regular basis and revise them, if necessary, to reflect advances in technology or newly developed ingredients.
- Participants discussed the need for improved labeling, including providing the percentage as well as the amount (by weight) of each ingredient on the product label.
- Participants discussed the need to educate consumers about standards and the requirements of individual standards.
- Some participants found it difficult to separate safety issues when discussing the costs and benefits of standards.

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